

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2013-59-E**

IN RE: Application of Duke Energy Carolinas, ) DIRECT TESTIMONY OF G. NEWTON  
LLC for Authority to Adjust and Increase ) PRESSLEY, ON BEHALF OF THE  
Its Electric Rates and Charges ) COMMISSION OF PUBLIC WORKS OF  
 ) THE CITY OF SPARTANBURG,  
 ) SOUTH CAROLINA AND THE  
 ) SPARTANBURG SANITARY SEWER  
 ) DISTRICT, INTERVENORS

1 **Q. PLEASE STATE YOUR FULL NAME, BUSINESS ADDRESS AND POSITION**  
2 **OF EMPLOYMENT.**

3 **A.** My name is G. Newton Pressley. My business address is 200 Commerce Street, Spartanburg,  
4 South Carolina 29304. I am employed with the Commission of Public Works of the City  
5 of Spartanburg, South Carolina and the Spartanburg Sanitary Sewer District,  
6 (hereinafter together as, "Spartanburg Water"), as Deputy General  
7 Manager of Finance and Administration.

8

9 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
10 **EXPERIENCE.**

11 **A.** I hold a B.S. Degree in Accounting from the University of South Carolina. I have been  
12 employed by Spartanburg Water since 1986, and have thirty years utility experience.

13

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?**

15 **A.** My testimony is in support the Intervention of Spartanburg Water, in Docket 2013-59-E.

1 **Q. CAN YOU EXPLAIN WHY AN AFFORDABLE SCHEDULE MP IS**  
2 **IMPORTANT TO SPARTANBURG WATER'S OPERATIONS?**

3 **A.** Yes. A Duke customer like Spartanburg Water can use Schedule MP to lower  
4 its overall electric costs. Rate Schedule MP is a multiple premises tariff that allows a customer  
5 (like Spartanburg Water) to take advantage of the diversity between its facilities to lower its  
6 total cost of power. Because of the diversity of operations at Spartanburg Water,  
7 several multiple premise facilities have peak demands that occur at different times  
8 of the month. Because Schedule MP is based on loads incurred at the time of the monthly  
9 Coincident Peak, Spartanburg Water has opportunities to significantly reduce its MP  
10 Facility electric bills, as opposed to being billed entirely for its usage based on the  
11 Non-Coincident method. By combining the loads (load aggregation), Spartanburg Water has  
12 opportunities to achieve significant savings over current rates such as Schedule OPT, that bill  
13 customers on Non-Coincident Peak demands.  
14

15 **Q. HOW WOULD AN INCREASE IN SCHEDULE MP DIRECTLY AFFECT**  
16 **SPARTANBURG WATER'S OPERATIONS?**

17 **A.** Among the approximate 155 current accounts that Spartanburg Water has with Duke, 13 of the  
18 major facilities/locations are on this tariff. MP customers like Spartanburg Water would not  
19 know the exact rate increase in Schedule MP, sought by Duke in this proceeding, unless they  
20 calculated the same.  
21

22 **Q. HOW IS YOUR EXPERIENCE DIRECTLY RELATED TO THE SUBJECT**  
23 **MATTER OF THIS DOCKET?**

24 **A.** My thirty years of experience in the utility field, along with my review of Duke's  
25 Application filed in this Docket, and my review of the impact of  
26 Duke's filing for an increase, *inter alia*, of Rate Schedule MP, places me in a  
27 position to testify competently in this matter.

1 **Q. PLEASE PROVIDE A SUMMARY OF SPARTANBURG WATER'S**  
2 **OPERATIONS.**

3 **A.** Spartanburg Water consists of the Commission of Public Works of the City of  
4 Spartanburg, South Carolina and the Spartanburg Sanitary Sewer District. These entities  
5 provide water and wastewater services to more than 200,000 residents.  
6

7 **Q. PLEASE DESCRIBE THE GEOGRAPHIC LOCATION OF**  
8 **SPARTANBURG WATER'S OPERATION.**

9 **A.** Spartanburg Water serves thirty communities, including all of the City of Spartanburg.  
10 Those thirty communities are located in four Counties, spanning from NE Greenville  
11 County, Spartanburg, Cherokee and Union Counties.  
12

13 **Q. PLEASE PROVIDE A SUMMARY OF SPARTANBURG WATER'S**  
14 **ACCOUNTS WITH DUKE.**

15 **A.** Spartanburg Water has approximately 155 accounts with Duke, thirteen of which are affected  
16 by the proposed increase to the Rate Schedule MP and its annual energy costs from Duke,  
17 exceed 2.58 million dollars.  
18

19 **Q. WILL SOME OF SPARTANBURG WATER'S CUSTOMERS SUFFER A**  
20 **DOUBLE FINANCIAL IMPACT, IF DUKE'S REQUEST INCREASE IS GRANTED? IF**  
21 **SO, PLEASE EXPLAIN.**

22 **A.** Yes. Some of our customers are customers of both Spartanburg Water System and  
23 Spartanburg Sanitary Sewer District.  
24

25 **Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY OF JEFFREY R.**  
26 **BAILEY, OF DUKE, THAT WAS PRE-FILED IN THIS DOCKET?**

27 **A.** Yes.

1 **Q. DO YOU BELIEVE THE DIRECT TESTIMONY OF MR. BAILEY, JUSTIFIES**  
2 **THE REQUESTED INCREASE TO RATE SCHEDULE MP? IF NOT, PLEASE**  
3 **EXPLAIN.**

4 **A.** No. Mr. Bailey's Testimony does not, among other things, provide testimony to  
5 this Commission explaining and supporting the proposed increase to Rate Schedule MP. In  
6 fact, Mr. Bailey's Testimony briefly mentions, but does not support an increase in Rate  
7 Schedule MP.

8  
9 **Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?**

10 **A.** Yes.